

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN**

|   |   |                         |
|---|---|-------------------------|
| WILLIAM JOHNSON, JILL JOHNSON,                | ) |                         |
| BRIAN MASON, NAOMI MASON, and                 | ) |                         |
| SECOND AMENDMENT FOUNDATION, INC.,            | ) |                         |
|   | ) |                         |
|   | ) |                         |
| Plaintiffs,                                   | ) |                         |
|   | ) | No. 2:17-CV-124-PLM-TPG |
| v.  | ) |                         |
|   | ) |                         |
| ROBERT GORDON, in his official capacity as    | ) |                         |
| Director of the Michigan Department of Health | ) |                         |
| and Human Services,                           | ) |                         |
|   | ) |                         |
| Defendant.                                    | ) |                         |

**JOINT STATUS REPORT**

As directed by the Court, the parties submit this Joint Status Report.

- The parties have been conducting discussions regarding the drafting of (A.) a revised Rule 400.9415 as well as the implementation of various training measures which, if they were to be enacted, would resolve Plaintiffs' Second Amendment claims, (B.) a settlement agreement which would include a resolution of Plaintiffs' claim for attorney's fees or an agreement to place said issue before the Court.
- The parties suggest a follow-up status report on or before April 30, 2021.

Dated: March 22, 2021

Respectfully submitted,

WILLIAM JOHNSON,  
JILL JOHNSON, and  
SECOND AMENDMENT  
FOUNDATION, INC.

ROBERT GORDON, Director of the  
Michigan Department of Social  
Services

By: /s/ David G. Sigale  
Attorney for Plaintiffs

By: /s/ Cassandra Drysdale-Crown  
One of the Attorneys for  
Defendant

David G. Sigale (Atty. ID# 6238103 (IL))  
LAW FIRM OF DAVID G. SIGALE, P.C.  
430 West Roosevelt Road  
Wheaton, IL 60187  
630.452.4547  
[dsigale@sigalelaw.com](mailto:dsigale@sigalelaw.com)

Cassandra Drysdale-Crown (P64108)  
Jennifer Walker (P73048)  
Tracy Van den Bergh (P70066)  
Assistants Attorney General  
Health, Education & Family Services  
Division  
525 W. Ottawa St. Fl. 3  
P.O. Box 30758  
Lansing, MI 48909  
517-335-7603/517-335-1152 Fax  
[DrysdaleCrownC@michigan.gov](mailto:DrysdaleCrownC@michigan.gov)  
[WalkerJ32@michigan.gov](mailto:WalkerJ32@michigan.gov)  
[VandenBerghT@michigan.gov](mailto:VandenBerghT@michigan.gov)